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REMARKS/ARGUMENTS

Applicant graciously appreciates the Office's attention to the instant application. In view of the following remarks, Applicant respectfully requests reconsideration and allowance of the subject application. This amendment is
5 believed to be fully responsive to all issues raised in the August 11, 2005 Office Action.

Claim History Summary:

Claims 1-36 were originally filed.
10 In an Office Action mailed August 11, 2005, claims 1-36 were rejected and the specification objected to.

Summary of Response:

The specification is currently amended at page 5, line 18.
15 Claims 1, 6, 8, 9, 11, 14, 19, 21, 22, 24, 27, 30 and 36 are currently amended and claims 1-36 are pending.

In the Specification

The specification is currently amended at page 5, line 18 to correct an
20 inadvertent typographical error whereby the reference numeral "46" now reads as "146". The Office's attention to this detail is appreciated.

In the Claims

Rejections under §103(a)

25 The Office set forth various rejections under 103(a):
Claims 1, 4-6, 11-14, 19, 24, 27-30 and 32-36 as being obvious over Love et al. (USPN 6091508), referred to as the Love reference, in view of Yoshida et al. (USPN 6130757), referred to as the Yoshida reference;

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Claims 2, 3, 10, 15, 16-18, 23, 25, 26 and 31 as being obvious over the Love reference in view of the Yoshida reference and further in view of Yang (USPN 6467087), referred to herein as the Yang reference;

Claims 7, 9, 20 and 22 as being obvious over the Love reference in view of the Yoshida reference and further in view of Kim et al. (USPN 6473788), referred to herein as the Kim reference; and

Claims 8 and 21 as being obvious over the Love reference in view of the Yoshida reference and further in view of Siwinski et al. (US 2002/0015066), referred to herein as the Siwinski reference.

Applicant notes that all of these rejections rely on the combination of the Love reference and the Yoshida reference. Obviousness under §103 requires (i) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings; (ii) a reasonable expectation of success; and (iii) that the prior art reference (or references when combined) must teach or suggest all the claim limitations, see MPEP §2143.

All independent claims (1, 11, 14, 24, 27, 30 and 36) were rejected as obvious over the Love reference in view of the Yoshida reference. Applicant currently amends these independent claims to clarify the claimed subject matter and submits that the independent claims are patentable over the Love reference in view of the Yoshida reference. Below, Applicant addresses the rejections for all claims as these rejections rely on the Love reference and further addresses the rejections for claims 8 and 21 as these rejections rely on the Siwinski reference.

Claims 1-7, 9 and 10

Claim 1, as currently amended, recites:

A method of revising software in a multifunctional printer, comprising:

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*revising a revisable software component for a part of a
multifunctional printer;
providing all other revisable software components for parts of the
multifunctional printer
5 qualifying the revised software component in conjunction with all
of the other revisable software components;
bundling the software components as a software bundle wherein
the software components comprise the qualified, revised software
component; and
10 loading the software bundle on to the multifunctional printer.*

As stated in the specification at page 9, line 1:

As described herein, an exemplary method of bundled upgrading helps
to assure part-to-part operational compatibility. In this method,
upgrading of software on a wholly part-by-part basis is disabled and
15 instead, all upgradeable (or revisable) software is upgraded (or revised)
through use of a software bundle. According to this method, each
software component of the software bundle has a guarantee of known
compatibility. For example, when a new software upgrade for a part
becomes available it is qualified with existing software upgrades for other
20 parts of a MFP. In an exemplary upgrade method, once a new software
upgrade has passed a qualification procedure, a new software bundle is
created comprising the new software upgrade (or upgrades) and other
qualified existing software.

25 Claim 1 recites qualifying a revised software component in conjunction with all
of the other revisable software components and bundling the software
components as a software bundle wherein the software components include the
qualified, revised software component. Applicant respectfully submits that the
Love reference does not disclose, teach or suggest such qualifying or bundling.

30 In contrast to the subject matter of claim 1, the Love reference discloses
downloading software to a printer to drive an external input device without
downloading routines that already exist in memory of the printer (see, e.g., Love
reference at col. 1, line 45 to col. 2, line 5). The Love reference refers to the

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already existing routines as "external" routines in that they are external to the downloaded software (see, e.g., Love reference at col. 6, lines 9-19). Further, the Love reference states at col. 6, lines 16-18: "All of these external routines are necessarily existing routines, since it is a purpose of this invention to make maximum use of routines already in the printer 1." (emphasis added)

Applicant asserts that the Love reference does not provide evidence sufficient to teach or suggest loading a software bundle where the bundle includes other revisable software components of a multifunctional printer. Instead, the Love reference teaches downloading only the software needed to drive an input device that is external to the printer - thereby making maximum use of routines already in the printer. While the Yoshida reference discloses a multifunctional printer, Applicant finds no evidence in the Yoshida reference to modify the Love reference's "limited" approach to the "bundle" approach of claim 1. For at least this reason, Applicant submits that claim 1 is patentable over the Love reference in view of the Yoshida reference.

Claims 2-7, 9 and 10 depend on claim 1 and are believed patentable over any rejection relying on the Love reference in view of the Yoshida reference for at least the same reason as claim 1.

20 *Claims 11-13*

Claim 11, as currently amended, recites:

A computer-readable medium storing computer-executable instructions to load a software bundle on to a multifunctional printer wherein the software bundle comprises a plurality of revisable software components for parts of the multifunctional printer and a qualified, revised software component for a part of the multifunctional printer, the qualified, revised software component qualified in conjunction with the plurality of revisable software components.

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Applicant submits that the Love reference and the Yoshida reference fail to disclose, teach or suggest the subject matter of claim 11. Applicant refers to the evidence and arguments for claim 1, above. In particular, the Love reference provides insufficient evidence to suggest a software bundle that
5 includes a qualified, revised software component for a part of a multifunctional printer.

Claims 12-13 depend on claim 11 and are believed patentable over any rejection relying on the Love reference in view of the Yoshida reference for at least the same reason as claim 11.

10

Claims 14-20, 22 and 23

Claim 14, as currently amended, recites:

*A method of revising software in a multifunctional printer, comprising loading the software on to a multifunctional printer in the form of a
15 software bundle wherein the software bundle comprises a plurality of revisable software components for parts of the multifunctional printer and a qualified, revised software component for a part of the multifunctional printer, the qualified, revised software component qualified in conjunction with the plurality of revisable software components.*

20

Applicant submits that the Love reference and the Yoshida reference fail to disclose, teach or suggest the subject matter of claim 14. Applicant refers to the evidence and arguments for claim 1, above. In particular, the Love reference provides insufficient evidence to suggest a software bundle that
25 includes a qualified, revised software component for a part of a multifunctional printer.

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Claims 15-20, 22 and 23 depend on claim 14 and are believed patentable over any rejection relying on the Love reference in view of the Yoshida reference for at least the same reason as claim 14.

5 **Claims 24-26**

Claim 24, as currently amended, recites:

A method of revising software in a multifunctional device, comprising:

revising at least one revisable software component of the multi-component software;

10 *providing all other revisable software components of the multifunctional device;*

qualifying the at least one revisable software component in conjunction with all of the other revisable software components;

15 *bundling the software components as a software bundle wherein the software components comprise the qualified, revised software component; and*

loading the software bundle on to the multifunctional device.

20 Applicant submits that the Love reference and the Yoshida reference fail to disclose, teach or suggest the subject matter of claim 24. Applicant refers to the evidence and arguments for claim 1, above. In particular, the Love reference provides insufficient evidence to suggest a software bundle that includes a qualified, revised software component for a part of a multifunctional device.

25 Claims 25 and 26 depend on claim 24 and are believed patentable over any rejection relying on the Love reference in view of the Yoshida reference for at least the same reason as claim 24.

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Claims 27-29

Claim 27, as currently amended, recites:

5 *A computer-readable medium storing computer-executable instructions to load a software bundle on to a multifunctional device wherein the software bundle comprises a plurality of revisable software components for parts of the multifunctional device and a qualified, revised software component for a part of the multifunctional device, the qualified, revised software component qualified in conjunction with the plurality of revisable software components.*

10

Applicant submits that the Love reference and the Yoshida reference fail to disclose, teach or suggest the subject matter of claim 27. Applicant refers to the evidence and arguments for claim 1, above. In particular, the Love reference provides insufficient evidence to suggest a software bundle that includes a qualified, revised software component for a part of a multifunctional device.

15

Claims 28 and 29 depend on claim 27 and are believed patentable over any rejection relying on the Love reference in view of the Yoshida reference for at least the same reason as claim 24.

20

Claims 30-35

Claim 30, as currently amended, recites:

25 *A multifunctional printer comprising:
 an input for receiving a software bundle wherein the software bundle includes revisable software components for at least two printer parts wherein at least one of the revisable software components comprises a qualified, revised software component qualified in conjunction with the other revisable software components; and*

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a processor configured to distinguish each of the software components included in the software bundle.

Applicant submits that the Love reference provides insufficient evidence to
5 suggest such a multifunctional printer that includes an input to receive revisable software for at least two printer parts. Applicant also directs the Office to the evidence and arguments presented for claim 1, above.

Claims 31-35 depend on claim 30 and are believed patentable over any rejection relying on the Love reference in view of the Yoshida reference for at
10 least the same reason as claim 30.

Claim 36

Claim 36, as currently amended, recites:

A multifunctional printer having software components, comprising:

15 *revision means for revising at least one software component for a part of the multifunctional printer;*

qualification means for qualifying the at least one revised software component wherein the qualifying qualifies the at least one revised software component in conjunction with one or more other revisable software components of the multifunctional printer;
20

bundle means for bundling the software components as a software bundle wherein the software components comprises the at least one revised, qualified software component; and

load means for loading the software bundle on another multifunctional printer.
25

Applicant currently amends claim 36 for purposes of clarity. Applicant respectfully directs the Office's attention to the revision means and the load means of the multifunctional printer of claim 36. Applicant submits that the

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Love reference and the Yoshida reference do not disclose, teach or suggest the subject matter of claim 36.

Claims 8 and 21

5 Claim 8, as currently amended, recites: *The method of claim 1 wherein the multifunctional printer comprises a smart print cartridge that operates cooperatively with at least one software component of the software bundle.*

Support for claim 8 is found in the application as filed, for example, see page 11, line 13 to page 12, line 1. Claim 21 recites similar language but depends on
10 claim 14.

The Office rejected claims 8 and 21 as being obvious over the Love reference in view of the Yoshida reference and further in view of Siwinski et al. (US 2002/0015066), referred to herein as the Siwinski reference. Applicant refers to the evidence and arguments above for claims 1 and 14 and further
15 submits that the Siwinski reference does not disclose, teach or suggest a smart print cartridge that operates cooperatively with at least one software component of the recited software bundle of claims 8 or 21. The Siwinski reference addresses ink jet printer "control logic to access information on consumable receiver media, inks, and cleaning fluids, and printing hardware". Applicant
20 finds no evidence to teach or suggest revision of such control logic.

Objections under 37 CFR 1.75

The Office objected to claims 27 and 11, claims 28 and 12, and claims 29 and 13 under 37 CFR 1.75 as being substantial duplicates. Applicant
25 requests reconsideration in light of the amendments. Should such objections remain, Applicant will make a good faith effort to address any such objections in a timely manner upon allowance of one of the objected to claims.

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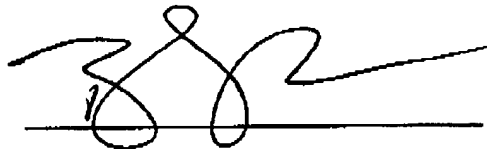
Conclusion

Pending claims 1-36 are believed to be in condition for allowance.
Applicant respectfully requests reconsideration and prompt issuance of the
present application. Should any issue remain that prevents immediate issuance
5 of the application, the Examiner is encouraged to contact the undersigned
attorney to discuss the unresolved issue.

10

Respectfully Submitted,
Lee & Hayes, PLLC
421 W. Riverside Avenue, Suite 500
Spokane, WA 99201

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Dated: 11/16/05

Name: Brian J. Pangrle

Reg. No. 42,973

Phone No. (509) 324-9256 ext. 231